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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, <i>Plaintiff,</i> v. JOHSIE NELSON, <i>Defendant.</i>	2:17-cr-00310-RFB-VCF STIPULATION AND ORDER TO CONTINUE SENTENCING HEARING (First Request)
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IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by and through Susan Cushman, United States Attorney, JOHNSIE NELSON, by and through her attorney, Richard E. Tanasi, Esq., that the Sentencing Hearing in the above-captioned matter, now scheduled for **July 19, 2018**, at the hour of 10:00 a.m., be vacated and continued to a time convenient for the Court after **October 8, 2018**.

Pursuant to General Order No. 2007-04, this Stipulation is entered into for the following reasons:

1. The parties need more time to prepare for sentencing, specifically in that Defendant needs time to gather 18 USC 3553 related materials. Additionally, counsel for the Defendant has two State capital cases set for September (State v. Brown and State v. Daniels). State v. Brown is older and likely to go forward.

1 2. Ms. Nelson is out of custody and does not object to this continuance.
2 3. The additional time requested herein is not sought for purposes of delay.
3 4. Additionally, denial of this request for continuance could result in a miscarriage
4 of justice.

5 **WHEREFORE**, the parties respectfully request that this Honorable Court accept the
6 Stipulation and enter an Order as set forth below, continuing the sentencing hearing for date
7 convenient to the Court, after **October 8, 2018**.

8 DATED this 21st day of June, 2018.

9
10 U.S. ATTORNEY'S OFFICE

11 _____
12 /s/ SUSAN CUSHMAN
13 501 Las Vegas Blvd., South
14 Suite 100
15 Las Vegas, NV 89101
16 Attorney for the UNITED STATES

17
18 TANASI LAW OFFICES

19 _____
20 /s/ RICHARD E. TANASI, ESQ.
21 601 S. Seventh Street, 2nd Floor
22 Las Vegas, NV 89101
23 Attorney for Defendant

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

2:17-cr-00310-RFB-VCF

Plaintiff,

ORDER ON STIPULATION

JOHNSIE NELSON.

Defendant.

This matter coming before the Court on Stipulation to Continue Sentencing Hearing, the Court having considered the matter, and good cause showing, the Court accepts the Stipulation.

WHEREFORE, IT IS HEREBY ORDERED, that the Sentencing Hearing in the above-captioned matter, now scheduled for **July 19, 2018**, at the hour of 10:00 a.m., be vacated and continued to Thursday, October 11, 2018 at 2:00 PM.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED: June 22, 2018.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 21st day of June, 2018, the undersigned served the foregoing **STIPULATION AND ORDER** on all counsel of record herein by causing a true copy thereof to be filed with the Clerk of Court using the CM/ECF system, which was served via electronic transmission by the Clerk of Court pursuant to local order.

/s/
An employee of TANASI LAW OFFICES

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